

## David Page

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**From:** Bond, Michael R. [Michael.Bond@KutakRock.com]  
**Sent:** Monday, June 23, 2008 5:14 PM  
**To:** Richard Garren; David Page  
**Subject:** RE: State of Oklahoma vs. Tyson Foods, Inc., et al.

**Attachments:** Coordinated Depo Calendar.doc



Coordinated Depo  
Calendar.doc ...

Re: <<Coordinated Depo Calendar.doc>> ck, thank you for your letter of today. I have forwarded your letter to counsel for the defendants but we have not had an opportunity to collectively discuss the specifics of your proposal. As you and I have previously discussed, a coordinated plan for depositions in this case is a must and the Defendants are eager to get a coordinated deposition calendar in place which covers the next few months. Accordingly, since you and I last spoke the Defendants have been working on a schedule and have prepared a color coded calendar which is attached to this email for the State's consideration. The calendar sets forth in Green depositions which have already been confirmed, sets forth in Blue deposition dates proposed by Defendants and sets forth in Red deposition dates proposed by the State for its experts.

The Defendants think in all fairness that the depositions which the Defendants intend to take in order to respond to the State's expert reports must take priority over all other depositions taken over the next couple of months. Those depositions are included in the calendar.

Also included in the calendar is the deposition of Archie Schaffer, a Tyson employee who the State recently noticed and we worked out an agreed upon date. As you are aware the Defendant's are under an extremely tight time frame to respond to the State's expert reports and have requested additional time from the Court to respond. The current scheduling order allows for discovery to be taken until April of 2009, as such, there is ample time for the State to conduct discovery after this response period.

Please review the attached calendar and discuss with your co-counsel. I am available to discuss at your convenience on Thursday and Friday of this week.

Thanks,

Michael R. Bond  
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Fayetteville, AR 72701-5221  
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-----Original Message-----

From: Deborah Ellis [mailto:DEllis@riggsabney.com]  
Sent: Monday, June 23, 2008 12:07 PM  
To: Bond, Michael R.  
Cc: Bill Narwold; Bob Nance; Daniel Lennington; David Page; David Riggs; Elizabeth Claire Xidis; Elizabeth Ward; Fidelma Fitzpatrick; Fred Baker; Ingrid Moll; Jean Burnett; Jonathan Orent; Julie Zielinski; Kelly Burch; Lee Heath; Louis Bullock; Melissa Carr; Michelle Jaromin; Mike Rousseau; Richard Garren; Sharon Gentry; Sharon Weaver; Trevor Hammons; Vaughn Iskanian

Subject: State of Oklahoma vs. Tyson Foods, Inc., et al.

<<20080623 ltr RTG to Bond re deposition scheduling.pdf>>

Mr. Bond:

Please see the attached correspondence from Richard T. Garren.

Deborah P. Ellis  
Secretary to Richard T. Garren  
Riggs, Abney, Neal, Turpen, Orbison & Lewis  
502 W. 6th St.  
Tulsa, Ok 74119-1010  
918/587-3161

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Green = agreement

Blue=Defendants' proposals

Red=Plaintiffs' proposals

July 2008

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
		1	2 Proposed: Jan Stevenson Proposed: Robert Taylor	3	4	5
6 Proposed: Barry Bolton	7 Proposed: Barry Bolton	8 Proposed: Mark Derschweiler (afternoon)	9 Proposed: Dennis Cooke Confirmed: Archie Schaffer	10 Proposed: Eugene Welch Proposed: Lowell Caneday	11 Proposed: Bill Fisher Proposed: A&L Labs	12
13	14 Proposed: Todd King	15	16 Proposed: Bernard Engel Proposed: Valarie Harwood	17 HEARING	18	19
20	21	22 Proposed: Robert Lawrence	23 Proposed: Lowell Caneday Proposed: Robert Lawrence	24 Proposed: Roger Olsen	25 Proposed: Dan Storm	26
27	28	29	30 Proposed: Christopher Teaf Proposed: Christopher Teaf (day 1)	31 Proposed: Christopher Teaf (day 2)		

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## August 2008

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
					1	2
3	4 Proposed: Additional 30(b)(6) Topics	5 Confirmed: Robert Taylor Proposed: Additional 30(b)(6) Topics	6 Proposed: Additional 30(b)(6) Topics	7 Proposed: Todd King Proposed: Additional 30(b)(6) Topics	8 Proposed: Additional 30(b)(6) Topics	9
10	11 Proposed: Roger Olsen (day 1)	12 Proposed: Roger Olsen (day 2)	13 Proposed: Berton Fisher	14 Proposed: C. Berger	15	16
17	18	19 Confirmed: Gordon Johnson	20 Proposed: Valerie Harwood	21	22	23
24	25	26 Confirmed: Darren Brown	27	28 Proposed: Scott Wells Proposed: Scott Wells (day 1)	29 Proposed: Scott Wells (day 2)	30
31						

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## September 2008

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
	1	2	3 Proposed: Berton Fisher (day 1)	4 Proposed Berton Fisher (day 2)	5	6
7	8	9	10 Proposed: Megan Smith	11	12	13
14	15	16	17 Proposed: Bernard Engel (day 1)	18 Proposed: Bernard Engel (day 2)	19	20
21	22 Proposed Eugene Welch (day 1)	23 Proposed: Eugene Welch (day 2)	24 Proposed: Dennis Cooke (day 1)	25 Proposed: Dennis Cooke (day 2)	26	27
28	29	30 Proposed: Jan Stevenson				

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## October 2008

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

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## November 2008

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

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## December 2008

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			